

## REMARKS

This Response is in reply to the Non-Final Office Action dated June 4, 2009. Claims 47-92 are pending in this application. Claims 47-92 are rejected. In the amendment, Claims 93-98 have been newly added. The amendment does not add new matter. In view of the amendment and/or for the reasons set forth below, Applicants respectfully submit the rejections are improper and should be withdrawn.

### **Rejections under 35 U.S.C. 103**

In the Office Action, Claims 47-51, 58-64, 70-74, and 81-87 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,240,555 to Shoff et al. ("Shoff") in view of U.S. Publication No. 2004/0117280 to Klee et al. ("Klee").

Claims 52, 53, 65, 66, 75, 76, 88, and 89 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shoff, in view of Klee, and further in view of U.S. Patent No. 7,363,591 to Goldthwaite et al. ("Goldthwaite").

Claims 54, 55, 67, 77, 78, and 90 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shoff, in view of Klee, and further in view of U.S. Publication No. 2003/0014753 to Beach et al. ("Beach").

Claims 56, 68, 79, and 91 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shoff, in view of Klee, in view of Beach, and further in view of U.S. Publication No. 2001/0027557 to Shinkawa et al. ("Shinkawa").

Claims 57, 69, 80, and 92 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shoff, in view of Klee, in view of Beach, in view of Shinkawa, and further in view of U.S. Publication No. 2003/0126600 to Heuvelman ("Heuvelman").

Applicants respectfully disagree and submit that the cited prior art, even if properly combinable, fails to disclose all the claim limitations in independent Claims 47, 58, 61, 70, 81, and 84.

Regarding exemplary Claim 47, the Examiner states that Shoff teaches, "additional related information is retrieved using the pointer ([Shoff] column 8, line 56 – column 9, line 8 and column 9, lines 20-29)." Office Action, page 9, line 22 – page 10, line 1. Presumably, this allegedly teaches the claimed "request means for requesting content meta information to the information distribution device based on the meta information reference ID received by the

reception means.” Thus, the Examiner equates Shoff’s additional related information to the claimed “content meta information” and Shoff’s pointer to the claimed “meta information reference ID.”

However, the additional related information retrieved in Shoff is supplemental content, and not meta information. Applicants respectfully submit that one ordinarily skilled in the art understands meta information (or metadata) to be information about information, and not merely a content. See e.g. <http://en.wikipedia.org/wiki/Metadata>. Shoff discloses at column 9, lines 20-29:

If the program is interactive compatible (i.e., the “yes” branch from step 154), the viewer computing unit retrieves the target specification from the EPG data structure (step 158 in FIG. 6). The target specification might be a pointer to a memory location at the headend, or a pointer to a memory location on a locally running CD-ROM, or a hyperlink to a target resource located at an independent service provider. The hyperlink browser 106 is loaded onto the processor to render the target resource referenced by the target specification (step 160).

Thus, Shoff discloses that a target resource/supplemental content itself is received based on the pointer and not meta information. Therefore, Shoff’s additional related information does teach the claimed “content meta information.”

Dependent Claims 50, 51, 64, 73, 74, and 87 further clarify the difference between content and content meta information. Exemplary Claim 50 recites, in part, “the *content meta information* received based on the meta information reference ID includes address information of an entity of the *content*.” (Emphasis added). Exemplary Claim 51 recites, in part, “first content access means for making an access to the *content* based on the address information of the entity of the content.” (Emphasis added). Thus, Applicants distinguish between “content” and “content meta information.”

Additionally, the Examiner states that Claims 50 and 51 are taught by Shoff disclosing “the pointers refer to the location of video data” and “the data is retrieved using the information in the pointer.” Office Action, page 5, lines 5-13. Thus, as understood, the Examiner equates Shoff’s pointer with the claimed “address information” and Shoff’s data/additional related information with the claimed “content.”

Therefore, the Examiner relies on Shoff’s pointer to teach both the claimed “meta information reference ID” and “address information.” The Examiner also relies on Shoff’s additional related information (Shoff, column 8, line 56 – column 9, line 8, and column 9, lines

20-29) to teach both the claimed “content meta information” and “content.” Applicants respectfully submit that this is improper and Shoff does not teach all the claimed limitations. If the Examiner maintains the rejection, Applicants respectfully request the Examiner clarify what teaches the claimed “program meta information,” “content meta information,” “meta information reference ID,” “content,” and “address information.”

Moreover, the cited prior art fails to disclose or suggest “wherein the content meta information acquired, based on the meta information reference ID, is a latest content meta information” as claimed in independent Claim 47 and similarly recited in Claims 61, 70, and 84. The cited prior art also fails to disclose or suggest “wherein the content meta information is updated in real time” as claimed in Claim 47 and similarly recited in Claims 58, 70, and 81. The Examiner relies on Klee to teach these elements.

Applicants respectfully disagree and submit Klee discloses “a database 34 that includes the master documents for all of the financial products to be offered by the bank and includes all clauses to be used in all regions” and “a database 36 that contains pricing information regarding all of the products to be offered.” Klee, paragraph [0038]. The only meta information that Klee references is meta data stored in a database 38 that “pertains to the attributes of the various clauses stored in the database 34.” Klee, paragraph [0038]. However, Klee is silent regarding updating the meta information in real time or receiving a latest meta data. Instead, Klee, paragraph [0048], discloses “the present invention allows current pricing data to be inserted dynamically in the disclosure content stream, thereby enabling *pricing information* to be updated and changed instantaneously.” (Emphasis added). Thus, Klee teaches that a content (pricing information) is updated and not that meta information is updated.

Applicants respectfully submit that Goldthwaite, Beach, Shinkawa, and Heuvelman fail to cure the deficiencies of Shoff and Klee. Accordingly, Applicants respectfully request that the obviousness rejections with respect to independent Claims 47, 58, 61, 70, 81, and 84 and the claims that depend thereon be reconsidered and the rejections withdrawn.

#### **New Claims**

Applicants further note that Claims 93-98 are newly added. The amendment is fully supported by the specification. For example, see paragraphs [0122], [0123], and [0146].

Applicants respectfully submit that the subject matter as defined in the newly added claims is patentable over the cited art of record for at least the same reasons as discussed above, and for the additional patentable elements recited therein. For example, the new claims clarify that “the content meta information is information about the content.” Thus, Shoff’s “additional related information” as referred to by the Examiner (Shoff, column 8, line 56 – column 9, line 8, and column 9, lines 20-29) cannot teach both the “content meta information” and the “content.” Moreover, the cited prior art is silent regarding “wherein content meta information is hierarchically below the program meta information” as newly claimed.

### **Conclusion**

For at least the forgoing reasons, Applicants respectfully submit that the present application is in condition for allowance and earnestly solicit reconsideration of the same.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing. If such a withdrawal is made, please indicate the Attorney Docket No. 112857-489 on the account statement.

Respectfully submitted,

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